

UNITED STATES OF AMERICA)	Case No. 01-455-A
)	
v.)	The Honorable Leonie M. Brinkema
)	
ZACARIAS MOUSSAOUI)	

The United States respectfully replies to defendant's motion to provide classified information to three defense experts, Drs. Martin, Grassian, and Amador. Although we continue to believe that the easier and safer course is to have the defense identify particular documents for their experts' review, request declassification and establish their experts' need to know, as long as the Court Security Officer believes the listed defense experts qualify for national security clearances, and those experts are willing to sign and abide by the appropriate Memorandum of Understanding, we do not oppose access necessary to the preparation of the defense case.¹

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¹ Notwithstanding our consent to the defense request, we note for the record that on two prior occasions in this case we wrote to defense counsel out of concern that Dr. Amador was disseminating to the media material provided in discovery and covered by a protective order in this case. We believe that this information is relevant to the Court Security Officer's determination whether Dr. Amador qualifies for a national security clearance, and, accordingly, we are forwarding to the Court Security Officer the letters we previously sent to the defense.

Certificate of Service

I certify that on the __ day of March, 2005, a copy of the foregoing Government's Response to Defendant's Motion to Amend Access to Classified National Security Information was faxed and mailed to the following:

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